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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
Plaintiff,)	
)	AMENDED JOINT WITNESS LIST
vs.)	
)	
)	Judge: Hon. Hernan D. Vera
CHEVRON USA, INC., a California)	Action Filed: August 3, 2023
Corporation, and DOES 1 through 10,)	Trial Date: August 19, 2025
inclusive,)	
)	
)	
Defendants.)	
)	
)	

Witness's Name, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony (subject to change due to witness availability)
Dr. Victor Adeyeye	At the relevant time, Dr. Adeyeye was a cardiologist for Chevron Nigeria who provided an opinion on Plaintiff's cardiac condition.	.25 hr.	.5	08/20/2025
Dr. Ujomoti Akintunde	At the relevant time, Dr. Akintunde was a cardiologist at Chevron Nigeria's clinic in Warri, Nigeria who provided an opinion on Mr. Snookal's condition.	.25 hr.	.5	08/20/2025
Dr. Eshiofe Asekomeh	Dr. Asekomeh conducted the Medical Suitability for Expatriate Assignment (MSEA) evaluation for Plaintiff. He determined that Plaintiff was not fit for duty based on his medical condition and available medical support.	.5 hr.	.75	08/20/2025
Dr. Charles Baum	Dr. Baum is a professor of economics and finance at Middle Tennessee State University. He has will testify regarding Plaintiff's lost earnings and lost employment benefits due to the rescission of the Expatriate position in Nigeria.	.5 hr.	.75	08/21/2025
Dr. Shahid Hameed Khan	At the relevant time, Dr. Khan was Plaintiff's treating cardiologist who determined that Plaintiff was fit for duty for an expatriate position. After Chevron rescinded the offer of Expatriate assignment, Dr. Khan also communicated with Chevron's Dr. Levy regarding Plaintiff's medical condition and risk of cardiac event. Dr. Khan communicated that Plaintiff's risk of a cardiac event was about 2% per year.	.33 hr.	.25	08/19/2025

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Dr. Scott Levy	At the relevant time, Dr. Levy was employed by Chevron as a Regional Medical Manager for the Europe, Eurasia, Middle East and Africa Region. He will testify regarding the fitness-for-duty medical evaluations for expatriate assignments. After Plaintiff complained about discrimination and challenged the decision to deem him unfit for duty, Dr. Levy reviewed Plaintiff's case for a second opinion.	.75 hr.	.5	08/19/2025
Cesar Malpica	Mr. Malpica replaced Mr. Zaheer in Escravos, Nigeria for 4 years.	.25 hr.	.25	08/20/2025
Dr. Alexander Marmureanu	<p>Dr. Marmureanu practices Thoracic and Cardiovascular Surgery. He is Board Certified in Cardiothoracic Surgery and General Surgery.</p> <p>Dr. Marmureanu will testify that the clinical data consistently indicates that Mr. Snookal's ascending aortic aneurysm and aortic root remained stable at 4.2 cm, with no significant progression over several years of monitoring. At this size, in his opinion, the annual risk of rupture or dissection was less than 1%, especially considering the stability of his condition and aortic measurements.</p> <p>Dr. Marmureanu will testify given that Plaintiff's work would be office-based and not physically demanding, there is no evidence to suggest that his condition would affect his job performance or pose an immediate risk or "direct threat."</p>	.5 hr.	.25	08/19/2025

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Andrew Powers	At the relevant time, Mr. Powers was a Senior Human Resources Manager at Chevron's El Segundo refinery. Plaintiff filed a complaint of disability discrimination with Mr. Powers. Mr. Powers has also had several expatriate assignments to other countries and Chevron USA consistently paid his salary throughout.	.33 hr.	.5	08/19/2025
Dr. Anthony Reading	Dr. Reading is an expert forensic psychologist who evaluated Mr. Snookal, and he will testify to Mr. Snookal's emotional distress damages.	.75 hr.	.75	08/21/2025
Dr. Chen Song	Dr. Song will testify in rebuttal to Mr. Snookal's economic expert	.75	.25	08/22/2025
Constance Snookal	Ms. Snookal is Plaintiff's wife. She will testify regarding her husband's damages as a result of Chevron's rescission of the Reliability Engineering Manager position.	.33 hr.	.5	08/21/2025
Mark Snookal	Plaintiff Mark Snookal will testify regarding his employment at Chevron USA; his application to be a Reliability Engineering Manager, an Expatriate assignment in Escravos, Nigeria; the application process; the two doctors (Dr. Khan and Dr. Sobel) who examined him who concurred that he was fit for duty; the offer of employment; Chevron's rescission of the expatriate assignment; Mr. Snookal's appeal of the rescission decision to Dr. Frangos and Dr. Levy; his complaint to Human Resources; and economic, emotional/psychological damages suffered by him.	1.5 hrs.	1.5	08/20/2025

Witness's Name, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam/ Direct Exam (Hours)	Dates of Testimony (subject to change due to witness availability)
Dr. Irving Sobel	Dr. Sobel was contracted by Chevron to conduct a fitness for duty examination for the Expatriate assignment in Nigeria.	.25 hr.	.25	08/20/2025
Amir Zaheer	Mr. Zaheer replaced Mr. Snookal in Escravos, Nigeria after Defendant rescinded the job offer.	.25 hr.	.25	08/20/2025

DATED: August 7, 2025

ALLRED, MAROKO & GOLDBERG

By: /s/ Dolores Y. Leal
DOLORES Y. LEAL
OLIVIA FLECHSIG
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MARK SNOOKAL

DATED: August 7, 2025

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